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United States District Court	DISTRICT of ARIZONA
United States of America	DOCKET NO.
V.	
Lawrence Mark Miguel; DOB: 1996; United States	MAGISTRATE'S CASE NO.
Randy Garcia; DOB: 1992; United States Hollyandra Shilynn Vavages; DOB: 2001; United States	20-08593MJ

Complaint for violation of Title 8 United States Code § 1324(a)(1)(A) (ii), 1324(a)(1)(A)(v)(I) and 1324(a)(1)(B)(i)

COMPLAINANT'S STATEMENT OF FACTS CONSTITUTING THE OFFENSE OR VIOLATION:

On or about February 25, 2020, in the District of Arizona, Lawrence Mark Miguel, Randy Garcia, and Hollyandra Shilynn Vavages, named herein as defendants and conspirators, did knowingly and intentionally combine, conspire, confederate, and agree with each other and other persons, known and unknown, to transport certain illegal aliens, namely Roberto Cano-Maqueda and Ivone Gutierrez-Gonzalez, and did so for the purpose of private financial gain; in violation of Title 8, United States Code, Sections 1324(a)(1)(A); 1324(a)(1)(A)(v)(I) and 1324(a)(1)(B)(i).

BASIS OF COMPLAINANT'S CHARGE AGAINST THE ACCUSED:

On or about February 25, 2020, in the District of Arizona, near North Komelik, United States Border Patrol Agents (BPAs) were following a 2012 Nissan Altima, when the driver came to a stop on his own on the side of the road. BPAs approached the vehicle, and questioned the occupants. Five people were inside the vehicle, including the driver, Lawrence Mark Miguel, and passengers, Randy Garcia, Hollyandra Shilynn Vavages, Roberto Cano-Maqueda and Ivone Gutierrez-Gonzalez, Both stated they are citizens of Mexico, in the country illegally.

In a post-Miranda statement, Lawrence Mark Miguel, admitted he was offered money to smuggle the illegal aliens. He stated he, Garcia, and Vavages all met with his cousin and another man, who provided Miguel with the Nissan, which already had the illegal aliens inside. Miguel stated he was going to split the proceeds with Garcia and Vavages. Miguel stated they were going to drive close to the checkpoint, and then one person would guide the group around the checkpoint, and be picked up on the other side.

In a post-*Miranda* statement, **Randy Garcia** admitted to knowing the passengers were illegal aliens, and that he was going to be paid to transport them. He further stated he planned on guiding the two aliens around the checkpoint, and they would be picked up later.

MATERIAL WITNESSES IN RELATION TO THE CHARGE: Roberto Cano-Maqueda and Ivone Gutierrez-Gonzalez

Detention Requested

Being duly sworn, I declare that the foregoing is true and correct to the best of my knowledge

AUTHORIZED BY: AUSA JAA/Inwith A CA OFFICIAL TITLE

Border Patrol Agent

SIGNATURE OF MAGISTRATE JUDGE

DATE

February 26, 2020

1) See Federal rules of Criminal Procedure Rules 3 and 54